

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION**

**WILLIAM F. UECKERT, JR.,
Plaintiff**

VS.

**CITY OF PHARR, TEXAS,
and JUAN G. GUERRA
Defendants**

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C.A. NO. 7:18-CV-00302

**DEFENDANTS FIRST AMENDED EXHIBIT LIST
EXHIBIT D-1 TO JOINT PRE-TRIAL ORDER**

May It Please the Court:

DEFENDANTS JUAN GUERRA AND CITY OF PHARR, TEXAS submit this current exhibit list in conjunction with the Joint Pre-Trial Order. The numbering and order of said exhibits is subject to change. Defendants reserves the right to amend this exhibit list as trial approaches.

Signed on this 11th day of January 2023.

Respectfully Submitted,

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COUNSEL FOR DEFENDANTS
CITY OF PHARR, TEXAS AND
JUAN GUERRA

DEFENDANTS' FIRST AMENDED EXHIBIT LIST

Ex.	Description	Agree	Objection	Admit	Date
1	Plaintiff's job description				
2	7/16 unsigned letters from Ueckert re: utilities				
3	7/19/16 signed letters from Ueckert re: utilities				
4	8/16 email with attachments from Pedraza to TexDot and others				
5	9/7/16 TxDot Saldivar email with attachments				
6	Joe Torres statement regarding meeting with Plaintiff				
7	9/16/16 email from Plaintiff to engineers TEDSI re: certifications				
8	Joe Torres 9.16.16 email to TEDSI re: certifications				
9	Joe Torres 9/18/16 email to Guerra				
10	Plaintiff September 19, 2016 email to Ed Wylie				
11	Wylie 9/19/16 email with termination recommendation attachments				
12	Recommendation of Discipline 9-19-2016				
13	Proposed Personnel Action Form 9-19-2016				
14	Plaintiff termination documents-PAF				
15	Pharr personnel manual				
16	Plaintiff self-researched certification docs- Ueckert depo Ex 14				
17	Plaintiff self-researched documents regarding certifications- Ueckert depo Ex 17				
18	City signed certifications with Mayor cover letter- 10/16				
19	TxDot signed certifications-10/16				
20	Torres-Saldivar email thread re: certifications 12/19/16				
21	Torres-Saldivar email thread with signed certifications -1/17/17 & 12/20/16				
22	City signed certifications 12/16-Saldivar depo Ex. 7				

23	Plaintiff's Resume; Pltf BS#1-3 (rsp to RFP)				
24	2014 Tax Returns; Pltf BS#100-108 (Supp Rsp to RFP)				
25	2015 Tax Returns; Pltf BS#109-114 (Supp Rsp to RFP)				
26	2016 Tax Returns; Pltf BS#115-121 (Supp Rsp to RFP)				
27	2017 Tax Returns; Pltf BS#122-127 (Supp Rsp to RFP)				
28	2018 Tax Returns; Pltf BS#128-146 (Supp Rsp to RFP)				
29	2019 Tax Returns; Pltf BS#147-176 (2 nd Supp Rsp to RFP)				
30	Davila Construction DWQ Records				
31	2020 Tax Returns; Pltf BS#177-186 (2 nd Supp Rsp to RFP)				
32	2021 Tax Returns; Pltf BS#187-215 (2 nd Supp Rsp to RFP)				
33	De Leon & Ybarra lawsuit documents- if needed				
34	Plaintiff's Deposition Testimony with exhibits				
35	Ed Wylie's deposition testimony with exhibits				
36	Juan Guerra's deposition testimony with exhibits				
37	Witness Joe Torres' deposition testimony with exhibits				
38	Witness Griselda Saldivar's deposition testimony with exhibits				
39	Defendant Juan Guerra declaration				
40	Defendant Ed Wylie declaration with attached documents				
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